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 and Sonichash, LLC*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

BCB CHEYENNE, LLC d/b/a BISON)
 BLOCKCHAIN,)
)
 Plaintiff)
 v.)
)
 MINEONE WYOMING DATA CENTER)
 LLC, MINEONE PARTNERS LLC.,)
 TERRA CRYPTO INC., BIT ORIGIN,)
 LTD., SONICHASH, LLC., BITMAIN)
 TECHNOLOGIES HOLDING)
 COMPANY, BITMAIN TECHNOLOGIES)
 GEORIGIE LIMITED, and JOHN DOES)
 1-18, related persons and companies who)
 Control or direct some or all of the named)
 Defendants.)
)
 Defendants.)

Civil Action No. 23-CV-79-ABJ

MOTION TO DISMISS

COME NOW Defendants Bit Origin Ltd. and Sonichash, LLC, by and through their counsel Meggan J. Hathaway, Esq. of Sundahl, Powers, Kapp & Martin, LLC. and Marc S. Gottlieb, Esq., of Ortoli Rosenstadt, LLP. and move to dismiss Plaintiff's First Amended Complaint (Doc. 50) herein pursuant to FRCP Rule 12(b)(1) for failure to allege and/or establish facts sufficient to establish diversity jurisdiction sufficient to satisfy 28 U.S.C. §1332(a)(1). In support of Defendants' motion, Defendants submit their memorandum of points and authorities filed concurrently herewith.

WHEREFORE, Defendants request that the Amended Complaint be dismissed, that Plaintiff take nothing thereby, for an award of their attorney's fees and costs incurred in the defense of this action, and for such other and further relief as the Court deems just and equitable.

Dated this 10th day of May 2024.

SUNDAHL POWERS KAPP & MARTIN, LLC.

By: /s/ Meggan J. Hathaway

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was duly served by filing with Pacer CM/ECF which sent copies to the following parties, on this 10th day of May 2024 addressed as follows:

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